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Subject: Section 114 Information Request
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Attachments: [181102 Response 181011 114 11-2-18.docx](#)

Sara—

I understand that Dr. Sahu had a very constructive call yesterday with Joe and Gustavo, which resulted in new, helpful information being shared on: 1) the existing continuous process-monitoring, including H₂S detection, and 2) the effective operation of the Scrubber-Control and Skid-Systems to purify the RNG, in order to meet the 4 ppm limit as required by the Nebraska Pipeline Regulations. We are optimistic that a common understanding of these influential facts will result in a more tailored and practical Information Request that will result in much more expedited data. So that we are all working with the same, complete factual understanding, I have attached as Exhibit A the most significant facts pertaining to the design and operation of existing process-monitors used in the affected Scrubber-Skid Systems—as well as a corresponding alternative solution.

On today's call, we could also like to discuss how to better define the scope of information under related Information Request question #3 in order to address EPA's primary focus. EPA has asked for BOE to provide documentation to demonstrate compliance with the provisions in NDEQ's Air Construction Permit in Section 33(3)(a)-(d). These subsections (a)-(d) generally require BOE to properly operate the Flare (EU 06) and the Skid-System (EU 07). These four cited provisions in the NDEQ permit do not require BOE to operate any monitors or retain any documentation other than basic maintenance records for the Flare. However, based on the focus of the Information Request on the Skid and related Control Scrubber, we assume EPA's focus is on obtaining "documentation" that would help illustrate how those skid/scrubber systems were maintained and properly operated. The attached document sets forth H₂S biogas monitors that could be helpful. However, we need to better define which specific process-Monitoring data would be most helpful to meet EPA's goals and objectives.

Best,
Bill

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